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one of said edge portions of said glass panel such that a minimal amount of force is used to separate said edge portion from said glass panel.

REMARKS

Claims 1-16 are pending in the present application. It is respectfully submitted that the pending claims define allowable subject matter.

Claims 1 and 2 were rejected under 35 U.S.C. § 102(b) as being anticipated by Correl *et al.* (United States Patent No. 5,133,491).

Claims 3 and 4 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Correl *et al.* in view of Kolycheck *et al.* (United States Patent No. 5,574,104).

Claims 5 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Allaire *et al.* (United States Patent No. 5,303,861) in view of Ahlm *et al.* (United States Patent No. 5,518,120).

Claim 6 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Allaire *et al.* in view of Ahlm *et al.* and further in view of Wilhite (United States Patent No. 6,050,167).

Claims 8-16 were withdrawn from consideration pursuant to the Applicants' electing with traverse the invention of claims 1-7.

The Applicants now turn to the rejection of claims 1 and 2 as being anticipated by Correl *et al.* First, the Applicants note that independent claim 1 has been amended to include the limitation that the separating device applies a controlled force along one of the edge portions of the glass panel such that a minimal amount of force is used to separate the edge portion from the glass panel. The Applicants respectfully submit that Correl *et al.* does not teach, suggest or otherwise disclose applying a controlled force

along an edge portion of a substrate such that a minimal amount of force is used to separate the edge portion. The fact that Correl *et al.* is used to separate 3,000 chips per hour and provides methods for collecting debris and dust demonstrates that the apparatus does not apply a minimal amount of force to cause separation. Therefore, the Applicants respectfully submit that Correl *et al.* does not anticipate amended claim 1 or claim 2, which depends from claim 1.

The Applicants now turn to the rejection of dependent claims 3 and 4 as being obvious over Correl *et al.* in view of Kolycheck *et al.* The Applicants note that this combination of references would not include all the limitations included within claims 3 and 4. As noted above, Correl *et al.* does not teach, suggest or otherwise disclose applying a controlled force along an edge portion of a substrate such that a minimal amount of force is used to separate the edge portion. Likewise, Kolycheck *et al.*, which discloses an electro-static dissipative polymeric composition, does not teach, suggest or otherwise disclose applying a controlled force along an edge portion of a substrate such that a minimal amount of force is used to separate the edge portion. Because neither Correl *et al.* nor Kolycheck *et al.* disclose this limitation, the Applicants respectfully submit that these references do not provide a basis for rejecting the current claims.

Additionally, to establish a *prima facie* case of obviousness, there must be some suggestion or motivation to modify the reference or to combine reference teachings. However, no reason has been shown why one of ordinary skill in the art would modify the Correl *et al.* reference as the office action proposes, nor has any reason been shown why it would be obvious to selectively combine these references to produce the claimed combination. The fact that the substrate breaker disclosed in Correl *et al.* slides the

substrates through a stick breaker and a chip breaker at a high speed demonstrates that the apparatus imparts electro-static charges on the chips and thus could not be used to manufacture glass panels carrying little or no electro-static charge. Therefore, the Applicants respectfully submit that there would be no motivation to combine Correl *et al.* with the electro-static dissipative material disclosed in Kolycheck *et al.*

For each of these reasons, the Applicants respectfully submit that claims 3 and 4 are non-obvious in view of these references.

The Applicants now turn to the rejection of claims 5 and 7 as being obvious over Allaire *et al.* in view of Ahlm *et al.* Allaire *et al.* discloses an apparatus for separating a sheet of glass along a scored line by pre-stressing the glass. Ahlm *et al.* discloses a package formed of electro-static dissipative material for containing and manipulating electronic components.

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation to modify the reference or to combine reference teachings. However, no reason has been shown why one of ordinary skill in the art would modify the Allaire *et al.* reference as the office action proposes, nor has any reason been shown why it would be obvious to selectively combine these references to produce the claimed combination. The fact that the separation apparatus disclosed in Allaire *et al.* applies a pressure bar to pre-stress the glass prior to separation demonstrates that the apparatus imparts electro-static charges on the glass and thus could not be used to manufacture glass panels carrying little or no electro-static charge. Therefore, the Applicants respectfully submit that there would be no motivation to combine Allaire *et al.* with an electro-static dissipative material.

For these reasons, the Applicants respectfully submit that claims 5 and 7 are non-obvious in view of these references.

The Applicants now turn to the rejection of claim 6 as being obvious over Allaire *et al.* in view of Ahlm *et al.* and further in view of Wilhite.

First, the Applicants respectfully submit that the Wilhite reference is not analogous art because it is not within the current inventors' field of endeavor, nor is the Wilhite disclosure reasonably pertinent to the problem solved by the inventors of the present application. Wilhite discloses a gauge block for use with a saw table that positions work pieces along the table to be cut at a desired length. Wilhite, Col. 1, lines 45-49. The present invention discloses locating pins used in the production of circuitry-etched glass panels used in medical components. The locating pins extend from a stage for precisely locating the glass panels above the separating apparatus in order that each glass panel be located in the same position on the separating apparatus. The locating pins thus allow for easy automation of the separating process. Marek Application, Page 5, lines 3-9.

The Wilhite reference, which is in the field of table saws, and the present invention, which is in the field of medical glass panel separation, are thus in different fields of endeavor. Further, the Wilhite reference is directed to the purpose of cutting work pieces at a desired length while the present invention is directed to the purpose of automating the separating of medical glass panels. Therefore, the Wilhite reference is not reasonably pertinent to the problem solved by the present invention. Thus, the Applicants respectfully submit that the Wilhite reference does not constitute analogous art and does not serve as an appropriate basis for an obviousness rejection.

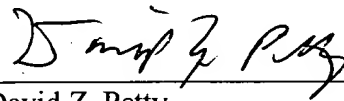
Even if the Wilhite reference is analogous to the present invention, it still would not have been obvious to combine Allaire *et al.*, Ahlm *et al.*, and Wilhite. As mentioned above, the separating apparatus disclosed in Allaire *et al.* imparts an electro-static charge on the glass by applying a press bar to pre-stress the glass prior to separation and thus could not be used to manufacture glass panels carrying little or no electro-static charge. Therefore, there would be no motivation to combine Allaire *et al.* with either the electro-static dissipative material disclosed in Ahlm *et al.* or the gauge block disclosed in Wilhite.

For these reasons, the Applicants respectfully submit that claim 6 is non-obvious in view of these references.

CONCLUSION

If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the Applicants.

Respectfully submitted,



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2/7/03

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APPENDIX A

1. (Amended/Marked-Up): A separating device for separating edge portions from a glass panel, said glass panel having a width and thickness, said device comprising a handle and a slotted plate connected to said handle, said slotted plate having upper and lower panel engaging surfaces defining a recess of approximately the same width and thickness as said glass panel to be separated, said separating device applying a controlled force along one of said edge portions of said glass panel such that a minimal amount of force is used to separate said edge portion from said glass panel.